

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

Civil No. 3:16-md-2738-FLW-LHG

This document relates to:
Carmela Salgado v. Johnson & Johnson, et al.
Case No. 3:20-cv-17795-FLW-LHG

**NOTICE TO TAKE VIDEOCONFERENCE
VIDEOTAPED TRIAL PRESERVATION DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the *Federal Rules of Civil Procedure*, and pursuant to the MDL In Extremis Deposition Protocol dated January 23, 2017, the oral and videoconference videotaped deposition of Plaintiff, **Carmela Salgado**, will be taken before a person authorized to administer the oath. As per agreement of all parties, the oath will be administered over videoconference and the identity of the witness stipulated on the record. This videoconference deposition will be videotaped and recorded for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not be available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

DATE & TIME OF DEPOSITION: **December 7, 2022 at 10:00 a.m.**

LOCATION: **Via Video Conference (link to be provided to Counsel prior to deposition)**

COURT REPORTER: **Carol Nygaard
2295 Gateway Oaks Dr #170,
Sacramento, CA 95833
(916) 928-8999**

Dated: December 2, 2022

Respectfully submitted,

MARY ALEXANDER & ASSOCIATES, P.C.

/s/ Mary E. Alexander

Mary E. Alexander. Esq.

Mary Alexander & Associates, P.C.

44 Montgomery Street, Suite 1303

San Francisco, CA 94104

Telephone: (415) 433-4440

Facsimile: (415) 433-5440

malexander@maryalexanderlaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2022, a copy of the foregoing Notice of Deposition was filed electronically with the Clerk of the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Mary E. Alexander
Mary E. Alexander, Esq.